

**Miller, Diane M.**

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**From:** SchofFam@aol.com  
**Sent:** Monday, August 26, 2002 12:44 PM  
**To:** NIOCINDOCKET@CDC.GOV  
**Subject:** SEC



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**From:** LA-POWS, contact Phillip Schofield [505-753-8433]

The LA-POWS would like to submit our comments for the record, on the proposed procedures for designating classes of employees for the special exposure cohort. First, we endorse the comments and suggestions as put forth by GAP. Second is we want to address the issue of the IREP model. We feel that too much of the IREP model is based on incomplete or bad science. Since the basis for much of the model comes from studies done on the nuclear survivors from Japan. Many of these studies are fundamentally flawed. The use of short-term high exposure, versus long term low exposure for causation is still hotly debated in science. Further the IREP model takes the numbers for causation from the Atomic Veterans and jacks them up by a factor of three to twenty-two. We feel that this raise's the bar so high on most cancers, that very few will ever be able to over come it. It will be an almost impossible task for NIOSH to do an accurate dose reconstruction on very large numbers of occupations at Los Alamos National Laboratory. Many of these occupations required people to move around from one facility or building to another, making the question of exactly what types of materials or radiation they were exposed to unknown. There is also good reason to question the validity of a person's exposure record. Given the many problems with the way the implementation and application of the way the EEOCPA is being done, petitioners should have the right to be in the SEC with they so desire. Only in this way can one be assured of a level playing field for all. The burned of prove then would lie on the employer or the government.